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RESPONSE DEADLINE: November 24, 2006 at 4:00 PM

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Attorneys for Empresas Ca Le Tlaxcala S.A. de C.V.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:
	:
DELPHI CORPORATION, <u>et al.</u>	:
	Chapter 11
	:
Debtors.	:
	Case No. 05-44481 (RDD)
	:
	(Jointly Administered)
	:
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RESPONSE OF EMPRESAS CA LE TLAXCALA S.A. de C.V.
TO DEBTORS' THIRD OMNIBUS CLAIM OBJECTION [CLAIM NO. 15512]

Empresas Ca Le Tlaxcala S.A. de C.V. ("Empresas") responds to the objection of the Debtors' concerning claim number 15512 that Empresas filed against Delphi Corporation on or about July 31, 2006, as follows:

1. The claim of Empresas is based upon that certain Environmental Matters Agreement entered into between Delphi Corporation and Johnson Controls, Inc. ("JCI") as part of JCI's purchase of Delphi's automotive battery business in July 2005. JCI acquired Empresas as part of that transaction. In the Environmental Matters Agreement, Delphi obligated itself to remediate certain environmental issues as contained on Schedule 2.1 to that Agreement. Schedule 2.1 in turn specifically identifies Empresas' facility in Tlaxcala, Mexico as a property that "requires seller's attention" to remediate lead contamination and other issues as identified in Delphi's Phase II Environmental Site Assessment. A copy of the Environmental Matters Agreement, including Schedule 2.1, is attached hereto as Exhibit A.

2. Delphi has failed to undertake the remediation work and has therefore breached the agreements. Empresas has been provided with an estimate of the cost to remediate its Tlaxcala facility. The total estimated amount for such work is \$793,374. A copy of the breakdown of that amount is also attached hereto as Exhibit B. The actual cost of the remediation work when fully completed may vary from the estimate and therefore Empresas provides this figure only as an estimate of the amount of its claim. Empresas reserves the right to amend or supplement this estimate as additional information becomes known. The person authorized to reconcile and resolve the claim on behalf of Empresas is Stephen T. Bobo, Sachnoff & Weaver, Ltd., 10 South Wacker Drive, 40th Floor, Chicago, Illinois, 60606, (312) 207-1000.

THEREFORE, Empresas submits that Delphi's objection should be overruled, that its claim number 15512 should be estimated in the amount of \$793,374, and that Empresas is entitled to amend or supplement this estimated amount as additional information becomes available.

Dated: November 22, 2006

RESPECTFULLY SUBMITTED

Empresas Ca Le Tlaxcala S.A. de C.V.

By: /s/ Elena Lazarou

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